

FILED
2019 NOV -7 PM 4:16
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ISA E. JUSUF,

Defendant.

INDICTMENT

1 : 19 CR 676

CASE NO. _____

Title 18, United States Code,
Sections 1623

JUDGE BARKER

COUNT 1

(False Declarations Before Grand Jury, 18 U.S.C. § 1623)

The Grand Jury charges:

1. On or about April 23, 2019, in the Northern District of Ohio, Eastern Division, ISA E. JUSUF, while under oath and testifying in a proceeding before Grand Jury Panel 19-1-G, a Grand Jury of the United States in the Northern District of Ohio, Eastern Division, knowingly did make a false material declaration, that is to say:

2. At the time and place aforesaid the grand jury was conducting an investigation to determine whether violations of Title 18, United States Code, Sections 1343, 1349, 2314, and 2, had been committed, and to identify the persons who had committed, caused the commission of, and conspired to commit such violations. It was material to the said investigation that the grand jury ascertain if JUSUF had ever provided his New York's learner's permit to A.A., an individual known to the grand jury.

3. At the time and place alleged, JUSUF appearing as a witness under oath at a proceeding before the grand jury knowingly made the following declaration in response to questions with respect to the material matter alleged in paragraph 2 as follows:

“Q. Have you ever given your driver’s license or State ID or driver’s permit to any of those three individuals [individuals known to the grand jury] at any time? A. “No, sir.”

“Q. Did you provide your learner permit to New York State to any persons? A. No, sir.”

“Q. Just to be clear, did you provide this permit to [A.A., an individual known to the grand jury]?

A. No, Sir.”

“Q. You’ve never given it [your learner’s permit] to anyone to use? A. No, sir.”

“Q. “You had never given [your learner’s permit] to anyone? A. No, sir.”

4. The aforesaid underscored testimony of ISA E. JUSUF, as he then and there well knew and believed, was false in that, ISA E. JUSUF had provided his learner’s permit to AA., a person known to the grand jury.

All in violation of 18 U.S.C. § 1623.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.